

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTOINE MCGEE (B39819),)	
)	
Plaintiff,)	No. 08 C 1020
)	
v.)	Hon. Charles P. Kocoras
)	Judge Presiding
)	
JOSEPH BURKE, et al.,)	
)	
)	
Defendants.)	

DEFENDANTS' MOTION TO ENLARGE

NOW COME Defendants, JOSEPH BURKE, MARK WILSON, ANTHONY DAVIS, MICHAEL GRANT, JERLIN ALLEN, BRIAN GIVENS, WILLIAM BROWN, MICHAEL BUCZKOWSKI, SANDY THOMPSON, and JEFF SAWYER by and through their attorney, LISA MADIGAN, Illinois Attorney General, and move this Court to grant Defendants additional time to respond to Plaintiff's complaint. In support of their motion, Defendants state:

1. An appearance was filed on April 8, 2008 for Mark Wilson, Anthony Davis, Michael Grant, William Brown, Michael Buczkowski, and Jeff Sawyer.
2. An appearance was filed on May 2, 2008 for Brian Givens, Sandy Thompson, Jerlin Allen, and Joseph Burke
3. The Illinois Attorney General's Office did not receive the request for representation from Joseph Burke until May 1, 2008.
4. There is another defendant, Wendy Olson Foxon, who will also be represented by the Illinois Attorney General's Office.
5. As of May 2, 2008, the Illinois Attorney General's Office has not received a request for representation from the other defendant.

6. Once a request for representation have been received from the other defendant, more time will be needed to investigate the allegations in the complaint and to investigate whether there are any conflicts by representing all of the served defendants.

7. In any event, it is likely that the Defendants in this case will share common defenses and litigation strategies.

8. In the interests of judicial economy, Defendants request an enlargement of time to file their responsive pleading so that once requests for representation for the other defendant is received, all Defendants may further investigate Plaintiff's allegations and whether any conflicts exist.

9. This motion is made in good faith and not for purposes of delay.

10. Plaintiff will not be unfairly prejudiced by the granting of this motion, but prejudice will inure if it is not granted.

WHEREFORE, Defendants respectfully pray that this Honorable Court grant this motion for enlargement of the time to file their response to Plaintiff's Complaint until 21 days after the last request for representation has been received by the Illinois Attorney General's Office.

Respectfully submitted,

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Attorney General of Illinois

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